

**REMARKS/ARGUMENTS**

Amended Claim 1 is a combination of dependent claims with no new issues or new matter added to Independent Claim 1.

For example, Amended Claim 1, part a) added "a bottom cushion having a circular shape and forming a pet bed for pets; said bottom cushion being received within said bottom cushion interior compartment." This limitation was taken from dependent Claim 7 and added to Claim 1, and therefore Amended Claim 1 raises no new issues. Also, the Thönnessen et al. '350 patent does not teach that its non-woven block 12 has a circular shape and does not teach being used for a pet bed. In fact, the non-woven block 12 is a "pillow" for humans.

Also, Amended Claim 1, part b) added "said bolster side being semi-circular in shape." This limitation was taken from dependent Claim 6 and added to Claim 1, and therefore Amended Claim 1 raises no new issues. Further, the Thönnessen et al. '350 patent does not teach that its non-woven roll 13 has a semi-circular shape. In fact, its shape is substantially cylindrical.

Additionally, Amended Claim 1, part c) added that "said zipper member includes a first zipper strip element being fixedly attached to an outer side wall section of said bottom cushion outer covering and a second zipper strip element being fixedly attached to an inner side wall section of said bolster cushion outer covering." This limitation was taken from dependent Claim 3 and added to Claim 1, and therefore Amended Claim 1 raises no new issues. Again, the Thönnessen et al. '350 patent does not teach that its connecting element

14 is a zipper connecting means. Further, its non-woven roll 13 is clearly attached to an upper cover surface 15 of non-woven block 12 and not attached to the side of non-woven block 12 of pillow 11. In fact, its connecting means are hook and loop fasteners.


Furthermore, the Thönnessen '350 patent is a "pillow" structure and does not teach that its pillow 11 is used for a pet bed.

Thus, Amended Claim 1 only has limitations taken from Dependent Claims 3, 6 and 7. Therefore, Amended Independent Claim 1 should be entered for purposes of Appeal, as it does not raise new issues, since these limitations in Claim 1 were always in the dependent Claims that the Examiner previously considered.

Therefore, it is respectfully requested that the Examiner enter Amended Claims 1, 4 to 12 for Appeal purposes.

Respectfully submitted,

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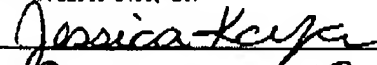
Enclosure

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